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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

MAY -7 1996

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )

Federal-State Joint Board )  
on Universal Service )

CC Docket No. 96-45

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JOINT INITIAL REGULATORY FLEXIBILITY ANALYSIS

REPLY COMMENTS OF  
NATIONAL SCHOOL BOARDS ASSOCIATION,  
AMERICAN LIBRARY ASSOCIATION, INCLUDING THE AMERICAN ASSOCIATION  
OF SCHOOL LIBRARIANS, A DIVISION OF ALA,  
NATIONAL EDUCATION ASSOCIATION, CONSORTIUM FOR SCHOOL NETWORKING,  
COUNCIL OF CHIEF STATE SCHOOL OFFICERS,  
EDUCATION LEGISLATIVE SERVICES, INC.,  
NATIONAL ASSOCIATION OF INDEPENDENT SCHOOLS,  
NATIONAL ASSOCIATION OF SECONDARY SCHOOL PRINCIPALS,  
AMERICAN FEDERATION OF TEACHERS, AFL-CIO, ASSOCIATION FOR THE  
ADVANCEMENT OF COMPUTING IN EDUCATION, NATIONAL ASSOCIATION OF  
ELEMENTARY SCHOOL PRINCIPALS, AMERICAN ASSOCIATION OF SCHOOL  
ADMINISTRATORS, AMERICAN PSYCHOLOGICAL ASSOCIATION,  
ASSOCIATION FOR SUPERVISION AND CURRICULUM DEVELOPMENT,  
COUNCIL FOR AMERICAN PRIVATE EDUCATION,  
COUNCIL FOR EDUCATIONAL DEVELOPMENT AND RESEARCH,  
GLOBAL VILLAGE SCHOOLS INSTITUTE,  
NATIONAL ASSOCIATION OF STATE BOARDS OF EDUCATION,  
NATIONAL PARENTS AND TEACHERS ASSOCIATION,  
UNITED STATES DISTANCE LEARNING ASSOCIATION  
AND CENTER FOR MEDIA EDUCATION

The joint commenters, representing the interests of public and private schools and libraries, hereby file the following reply comments to supplement our initial response to the Initial Regulatory Flexibility Analysis ("IRFA") contained in the Notice

NO. 96-45  
LIST A 2011

0211

of Proposed Rulemaking and Order Establishing Joint Board

("NPRM") in the above-captioned proceeding.<sup>1</sup>

This response is filed pursuant to the Regulatory Flexibility Act, P.L. 95-354 (1981), as amended by the Debt Limit Act, P.L. 104-121, Title II of which is known as the Small Business Regulatory Enforcement Fairness Act of 1996, and which was signed by the President on March 29th. Subtitle D of Title II imposes specific requirements on the Commission with respect to its regulatory flexibility analyses.

As we stated in our initial IRFA response, we are concerned that the Joint Board's recommendations and the Commission's rules may impose unnecessary economic or procedural burdens on small governmental jurisdictions. The comments of a number of parties, including the United States Telephone Association, NYNEX, and other local exchange carriers, would require schools and libraries to apply for funding through a state-level application and review process. If adopted, this process would require school and library districts to either hire new staff or impose new burdens on existing staff to prepare and update applications. This is precisely the type of requirement that the Regulatory Flexibility Act requires the Commission to examine with care.

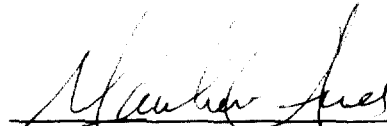
We request that the Commission reject any proposal that would require schools and libraries to apply for funding. We also renew our request that the Commission reject any proposals

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<sup>1</sup> The joint commenters are also filing reply comments responding to the comments of other parties regarding the matters addressed in the NPRM.

that call for complicated certification procedures, and recommend that no procedures be imposed beyond those required by existing local procurement rules.

Respectfully submitted,



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May 7, 1996

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Certificate of Service

I hereby certify that I have caused to be mailed this 7th day of May, 1996, copies of the foregoing Joint Reply Comments of National School Boards Association, et al. by first class mail, postage prepaid, to the following persons:

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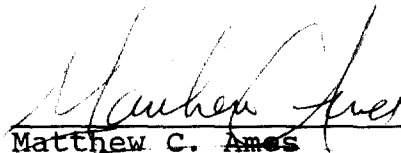
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May 7, 1996